

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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| In re Terrorist Attacks on September 11, 2001 | 03 MDL 1570 (GBD) (SN)<br><br>ECF Case |
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This document relates to:

*Federal Insurance Co., et al. v. Al Qaida, et al.*, 03-cv-06978  
*Thomas E. Burnett, Sr., at al. v. Al Baraka Inv. & Dev. Corp., et al.*, 03-cv-09849  
*Estate of John P. O'Neill, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, 04-cv-01923  
*Continental Casualty Co., et al. v. Al Qaeda, et al.*, 04-cv-05970  
*Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al.*, 04-cv-07065  
*Euro Brokers Inc., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, 04-cv-07279

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**DECLARATION OF ROBERT T. HAEFELE TRANSMITTING EVIDENCE  
IN SUPPORT OF PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO  
DEFENDANTS' MOTION TO EXCLUDE THE SUPPLEMENTARY EXPERT  
REPORT OF JONATHAN WINER**

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I, Robert T. Haefele, pursuant to 28 U.S.C. §1746, declare, under penalty of perjury, that the following statements are true and correct:

1. I am an attorney with the law firm of Motley Rice LLC, admitted to practice before this Court. I represent plaintiffs in the above-captioned multidistrict litigation and am a member of the Plaintiffs' Executive Committee for the Personal Injury and Death Claims, on which I act as co-liaison counsel for the Committee.

2. I submit this Declaration to identify and transmit into evidence exhibits referenced in Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion to Exclude the Supplementary Report of Jonathan Winer.

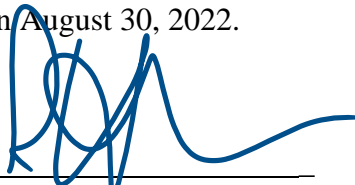
3. Attached hereto are true and correct copies of each of the Exhibits identified below.

4. Exhibit A is excerpted pages from the Deposition of Jonathan Winer, taken on July 13, and July 14, 2021.

5. Exhibit B is excerpted pages from the Hearing Transcript for the September 14, 2021 Hearing before Magistrate Judge Sarah Netburn.

6. Exhibit C is excerpted pages from the Hearing Transcript for the March 22, 2016 Hearing before Magistrate Judge Frank Maas.

Executed in Mount Pleasant, South Carolina, on August 30, 2022.

  
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Robert T. Haefele, Esq.